

**In the United States District Court
For the Northern District of Illinois
Eastern Division**

**Cleversafe Inc.,
Plaintiff**

v.

**Amplidata Inc.,
Defendant**

§ **Civil Action: 1:11cv4890**
§
§ **Judge: John Z. Lee**
§
§ **Magistrate: Jeffrey Cole**
§
§

**PLAINTIFF CLEVERSAFE, INC.'S MOTION TO RECONSIDER
CLAIM TERM CONSTRUCTIONS**

Plaintiff Cleversafe Inc. (“Cleversafe”) pursuant to the briefing schedule set by the Court on May 23, 2014 (D.E. 278) hereby submits its Motion to Reconsider the construction of the disputed claim terms “data slice / plurality of data slices;” “encode, using a coding algorithm, a plurality of subsets of data to create a plurality of coded values;” and “list of unusable storage nodes” set forth in the Memorandum Opinion and Order (D.E. 277) issued May 20, 2014.

A memorandum in support of this motion detailing the facts, law, and persuasive reasoning is submitted herewith.

WHEREFORE, Cleversafe respectfully requests the Court enter an order:

1. Revising the construction of the disputed claim terms “data slice / plurality of data slices;” “encode, using a coding algorithm, a plurality of subsets of data to create a plurality of coded values;” and, “list of unusable storage nodes;” and
2. Providing such other relief as this Court deems appropriate.

Dated: May 30, 2014

Respectfully submitted,

/s Michael Stolarski /

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